

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

GODO KAISHA IP BRIDGE 1,

Plaintiff,

v.

BROADCOM LIMITED, BROADCOM  
CORPORATION, AVAGO TECHNOLOGIES,  
LTD., AVAGO TECHNOLOGIES U.S., INC.,  
and LSI CORPORATION

Defendants.

)  
) Case No. 2:16-cv-00134-JRG-RSP

)  
) **JURY TRIAL DEMANDED**

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**DECLARATION OF ALEXANDER MIDDLETON**

I, Alexander Middleton, hereby declare as follows:

1. I am an attorney admitted to practice in the Eastern District of Texas. I am an associate at the law firm of Ropes & Gray LLP. Ropes & Gray LLP is counsel for Defendant Godo Kaisha IP Bridge 1 (“IP Bridge”).

2. I submit this declaration in support of Plaintiff IP Bridge’s Response to Defendants Broadcom Ltd. and Avago Technologies Ltd.’s Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(2) and Fed. R. Civ. P. 12(b)(6).

3. I am over the age of 18 and make this declaration based on my personal knowledge.

4. Attached as Exhibit A is a true and correct copy of Broadcom’s List of Locations webpage, at [https://www.broadcom.com/contact/locations\\_list.php](https://www.broadcom.com/contact/locations_list.php), last visited May 20, 2016.

Highlighting has been added for the convenience of the court.

5. Attached as Exhibit B is a true and correct copy of a presentation, “Broadcom Limited Company Overview,” dated March 2016.

6. Attached as Exhibit C is a true and correct copy of Broadcom Limited’s Form 10-Q, filed March 10, 2016. Highlighting has been added for the convenience of the court.

7. Attached as Exhibit D is a true and correct copy of Avago Technologies “Distributors” webpage, at <http://www.avagotech.com/how-to-buy>, last visited May 12, 2016. Highlighting has been added for the convenience of the court.

8. Attached as Exhibit E is a true and correct copy of Avago Technologies “eSamples” webpage, at <http://www.avagotech.com/how-to-buy/>, last visited May 12, 2016. Highlighting has been added for the convenience of the court.

9. Attached as Exhibit F is a true and correct copy Avago Technologies “Sales” webpage, at <http://www.avagotech.com/how-to-buy/>, last visited May 12, 2016. Highlighting has been added for the convenience of the court.

10. Attached as Exhibit G is a true and correct copy of Avago Technologies “Cart” webpage, at <https://www.avagotech-online.com/Cart>, last visited May 22, 2016. Highlighting has been added for the convenience of the court.

11. Attached as Exhibit H is a true and correct copy of Avago Technologies Limited’s Form 10-K, filed December 17, 2015. Highlighting has been added for the convenience of the court.

12. Attached as Exhibit I is a true and correct copy of Avago Technologies “Request Tech Support: Americas” webpage, at <http://www.avagotech.com/support/request-tech-support/americas>, last visited May 12, 2016.

13. Attached as Exhibit J is a true and correct copy of Avago Technologies “Support” webpage, at <http://www.avagotech.com/support>, last visited May 22, 2016. Highlighting has been added for the convenience of the court.

14. Attached as Exhibit K is a true and correct copy of a map of Broadcom’s sales offices located in Texas.

15. Attached as Exhibit L is a true and correct copy of Broadcom’s homepage, at <https://www.broadcom.com/>, last visited May 12, 2016. Highlighting has been added for the convenience of the court.

16. Attached as Exhibit M is a true and correct copy of Broadcom’s webpage biography for Chief Technology Officer, Henry Samueli, Ph.D, at <https://www.broadcom.com/company/leadership/leadership.php?executive=samueli>, last visited May 13, 2016. Highlighting has been added for the convenience of the court.

17. Attached as Exhibit N is a true and correct copy of Broadcom’s webpage biography for Chief Sales Officer, Charlie Kawwas, Ph.D, at <https://www.broadcom.com/company/leadership/leadership.php?executive=kawwas>, last visited May 13, 2016. Highlighting has been added for the convenience of the court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 27, 2016

/s/ Alexander Middleton  
Alexander Middleton